

STONE MAGNANINI

COMPLEX LITIGATION

May 9, 2022

VIA ECF

Honorable Michael A. Hammer
United States District Court
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

Re: *United States v. Jobadiah Sinclair Weeks*, Crim No. 19-cr-877

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion, on behalf of defendant Jobadiah Sinclair Weeks (“Mr. Weeks”). Mr. Weeks respectfully requests that the Court enter an Order granting Mr. Weeks discretionary leave to attend two events for his daughter, Liberty Weeks (“Liberty”). Both occasions are formative events for Liberty, and Mr. Weeks’ attendance is important for his relationship with her. The Court’s Order Setting Conditions of Release restricts Mr. Weeks’ travel to “New Jersey” and “Colorado”. The Conditions also require Mr. Weeks to remain in his residence under home incarceration and under the “supervision” of third party custodians. Both events are within the State of Colorado. Moreover, in attendance at both events will be Mr. Weeks’ wife, Stephanie Weeks, and Mr. Weeks’ father, Nathaniel Weeks, both of whom are third party custodians.

The first event is Liberty’s final soccer game of this season which is scheduled to take place on Saturday, May 14, 2022. The game is scheduled to begin at 9:00 a.m. MDT, and will be held at 5 Acres Sports Park, located at 55114 East Bison Drive, Strasburg, Colorado 80136. Accounting for the time necessary to travel the distance between Mr. Weeks’ home and the soccer game, as well as the length of the game itself, Mr. Weeks would need to be away from his

home for approximately two hours, departing at 8:30 a.m. and returning at 10:30 a.m. As a result of the home detention that Mr. Weeks has been under, he has been unable to attend any of Liberty's games this season. His attendance at the final game would be significant.

The second event is a dance recital for Liberty, to occur on Saturday, June 4, 2022 at 2:30 p.m. MDT. The location of the recital has not yet been determined, but it is being held by Studio 9 Dance Group. Again, considering the distance that Mr. Weeks may need to travel to attend the recital at any of the potential locations, he would likely be away from his home for approximately four to five hours. Accordingly, Mr. Weeks would seek permission to leave his home at approximately 1:00 p.m. and return by 5:30 p.m. This too, is an important moment in Liberty's life, and Mr. Weeks' attendance would be significant for his entire family.

This request has been reviewed by the Government and Pretrial Services and they have no objection to the relief requested.

Respectfully submitted,

/s/ David S. Stone
David S. Stone
Managing Partner

cc: Anthony P. Torntore, AUSA (via ECF & e-mail)
Matthew Schwartz, Esq. (via ECF & e-mail)
U.S. Pretrial Services Officer, David E. Hernandez (via e-mail)